

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

NO.: 22-CR-40 (JRT/LIB)

Plaintiff,

v.

**STEVE SHAND'S
MOTION TO TRAVEL**

STEVE ANTHONY SHAND,

Defendant.

Steve Shand, by and through his attorneys, moves this Court for an Order allowing him to travel to St. Ann Parish, Jamaica from February 20, 2025, to February 24, 2025, to attend the funeral of his mother. As grounds for this request, he states the following.

BACKGROUND

On November 22, 2024, Mr. Shand was found guilty after trial. The Court continued his conditions of release pending sentencing. Mr. Shand currently resides in Florida. He has been on pretrial release without incident since January 24, 2022.

REASONS FOR REQUEST

Mr. Shand is requesting the opportunity to travel to St. Ann Parish, Jamaica to attend his mother's funeral. As the Court is aware Mr. Shand is originally from Jamaica and his mother resided in Jamaica until her death. The funeral is scheduled for February 22, 2025. If the Court grants his motion to travel Mr. Shand's plan is to travel to Jamaica on February 20, 2025, and return to Florida on February 24, 2025. During his time in Jamaica he will stay with his brother. He will provide his brother's address and contact information to pretrial.

Counsel has contacted the government regarding Mr. Shand's request. Counsel provided the government with records related to the death of Mr. Shand's mother. Nevertheless, the government opposes Mr. Shand's travel request.

Mr. Shand respectfully requests this Court allow him to travel to Jamaica to attend his mother's funeral and to possess his U.S. Passport for that purpose.

Dated: January 16, 2025.

Respectfully submitted,

s / Aaron J. Morrison

AARON J. MORRISON

Attorney ID No. 0341241

LISA M. LOPEZ

Attorney ID No. 395791

Attorneys for Mr. Shand

107 U.S. Courthouse

300 South Fourth Street

Minneapolis, MN 55415